

Responses to Judith S. Leithner regarding my April 12, 2000 concerns

September 20, 2000

Judith Leithner (JL) Response:

"It is important to distinguish between the two projects being discussed here."

Joan Broderick (JB) Concerns in April 12th letter:

*"Comparison of 1997 Environmental Surveillance Technical Memorandum (ESTM) **with reference to** LOOWS Phase 1, July 1999."*

Concerns Regarding Radon Gas

JB - Table 4 missing in 1997 copy - same as 1998. Included in revised '98 copy.

JL- Gave a very good technical explanation of Radon Gas-220 and 222.

Concerns Regarding Groundwater Flow

JL- "There may be a good reason for changing groundwater flow."

JB- *I would still like to know the reason.*

JL- "The upper and lower groundwater flow charts have been transposed."

JB- *Now I think you can understand my concern! If you are testing for radioactive constituents from groundwater wells and the 1997 report shows testing of groundwater **coming from** the Waste Containment Structure and the 1998 report shows testing of groundwater **going to** Waste Containment Structure, this becomes a significant observation. To confuse the issue, was the transposing of Figures 3,4,5, and 6 in the '98 report.*

JL- "The '97 and 1998 reports were issued at very nearly the same time, each containing the appropriate year's data. ...same hydrogeologic figures in each report."

JB- *Nevertheless, Figures 3, 4, 5, 6 were transposed and groundwater flow direction reversed.*

JL did state that this was an error by Bechtel National, Inc. in preparing the Technical Memorandums.

From my standpoint as I studied the report, this was a huge error.

Concerns Regarding 5.6.2.3 Groundwater- Radioactive Constituents

- JL- "This was text that was a carry over from an earlier report," It should have been eliminated.
- JB- *This information was not in the 1997 report, so you can understand a novice's concern (especially since Figure 7 was missing). Your report writers should be made aware of this.*

Concerns Regarding Change in Wording

- JB - *"Since the change in testing direction, does this mean coming from another site, CWM/Modern.*
- JL- CWM handles chemical waste and Modern handles municipal waste."
- JB- *But is it not true that CWM now resides on former Lake Ontario Ordinance Works property, and this is adjacent to the Niagara Falls Storage Site, and as previously mentioned, groundwater maps were transposed unknown to me at the time!*

Concerns Regarding 5.6.2.3 Groundwater-Chemical Constituent/Metals

- JB- *Again the transposed maps and groundwater flow could have been the reason for the difference.*

Concerns Regarding Delay in Phase 2 Due to Lack of Funds

DERP-FUDS Fact Sheet

- JB- *I am aware that LOOWS and NFSS are two separate projects, but they are related and that concerns me. Some concerns did arise from the Jan. 2000 DERP-FUDS Fact Sheet.*

i am not going to elaborate any longer, but I want you to understand a layman's concerns. You can see that all my concerns were related due to careless reporting and information that I had on hand, (DERP-FUDS Fact Sheet).

Ms Leithner - I think that you are doing a superb job in trying to convey what is happening. I also thank the U.S. Army Corps of Engineers for the Restoration Advisory Board and open public meetings. It will help the Federal, State, and Municipal governments from "passing the buck."

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